



March 9, 2020

VIA ECF

The Honorable Michael A. Shipp
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*
Civil Action No. 19-17272-MAS-ZNQ

Dear Judge Shipp:

This firm represents Defendants in the above-referenced matter. Defendants filed a Motion to Dismiss regarding the RCN Defendants and a separate Motion to Dismiss regarding Defendant Patriot Media Consulting, LLC [ECF Nos. 15 and 30, respectively]. Pursuant to L. Civ. R. 7.1(d)(5), Plaintiffs received an extension of their response deadline and timely filed Briefs in Opposition on February 18, 2020 [ECF Nos. 52 and 53]. The Court then granted Defendants a 14-day extension of time to file their Reply Briefs, which are currently due today, March 9, 2020. [ECF No. 55].

Over this past weekend, Defendants' lead counsel, Richard Brophy, experienced a significant medical issue that has caused him to be unable to review, contribute to, and confer with his client about Defendants' Reply Briefs. Accordingly, Defendants respectfully request a two-day extension to file their Reply Briefs pursuant to L. Civ. R. 6.1(a), from March 9, 2020 to March 11, 2020. Plaintiffs' counsel has been contacted and consents to this extension.

Respectfully Submitted,

/s/ Edward F. Behm, Jr.

Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF

The above Application is SO ORDERED this ____ day of March, 2020.

The Honorable Michael A. Shipp